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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

MARK K. WELCH,

Plaintiff,

v.

MCNEIL & MEYERS RECEIVABLES  
MANAGEMENT GROUP, LLC,

Defendant.

Case No. 1:20-cv-00138-DAD-BAM

**MOTION FOR ENTRY OF DEFAULT**

**To the Clerk of the U.S. District Court for the Eastern District of California**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff MARK K. WELCH, requests that the Clerk enter the default of Defendant MCNEIL & MEYERS RECEIVABLES MANAGEMENT GROUP, LLC, for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure as appears from the affidavit of Nathan C. Volheim, Esq. attached hereto.

Dated: March 2, 2020

Respectfully submitted,

s/ Nicholas M. Wajda  
Nicholas M. Wajda  
*Counsel for Plaintiff*  
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**CERTIFICATE OF SERVICE**

The undersigned, one of the attorneys for Plaintiff, certifies that on March 2, 2020, he caused a copy of the foregoing PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT, to be served on all parties of record via CM/ECF, electronic mail and by U.S. Certified mail to the following addresses:

McNeil & Meyers Receivable Management Group, LLC  
3525 North Causeway Blvd., Suite 833  
Metairie, Louisiana 70002

McNeil & Meyers Receivable Management Group, LLC  
Attn: Jeff Hurley, Senior Partner and Chief Executive Officer  
3525 North Causeway Blvd., Suite 833  
Metairie, Louisiana 70002  
jhurley@mcneilmeyers.com

McNeil & Meyers Receivable Management Group, LLC  
Attn: Mark Patterson, Chief Operating Officer  
3525 North Causeway Blvd., Suite 833  
Metairie, Louisiana 70002  
mpatterson@mcneilmeyers.com

Respectfully submitted,

s/ Nicholas M. Wajda  
Nicholas M. Wajda